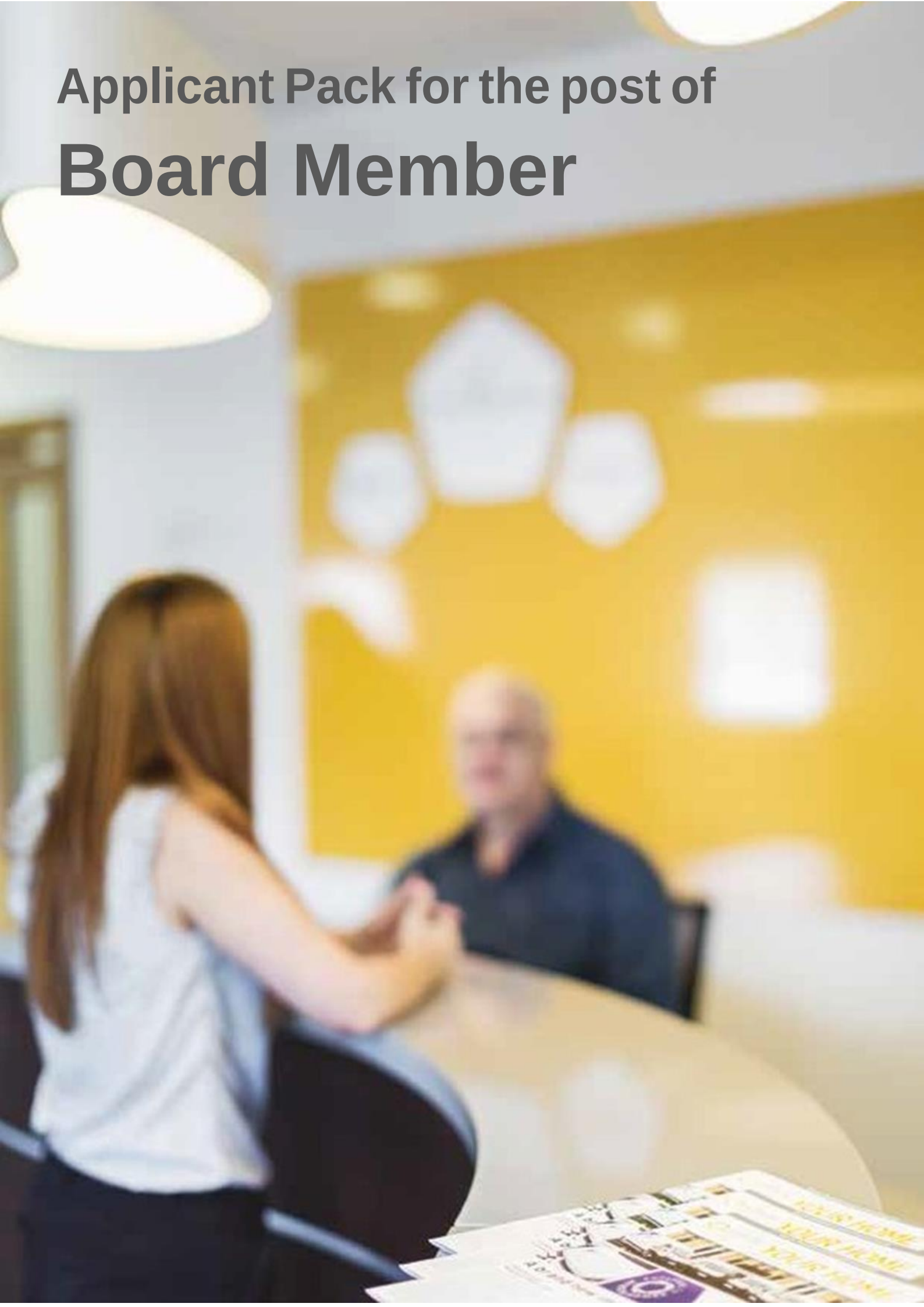
Applicant Pack for the post of

Board Member



Application to become a volunteer Board Member

Thank you very much for your interest regarding the above.

Our applicant pack contains some background information on Atrium, and the role and responsibilities of the Board of Directors which you might find useful. Can I draw your attention to the Code of Conduct for Governing Body Members, in particular, as you will be required to agree to adhere to it as a Board member.

You'll also find more information on Atrium at the website of the Scottish Housing Regulator (www.scottishhousingregulator.gov.uk)
and on our own website which you can find at www.atrium-homes.co.uk.

If you'd like an informal chat about what's involved, please contact me on 01563 528816.

If you are interested in pursuing your enquiry further, I should be grateful if you would complete the **Board Member Application** form and return it to me via email at shannon.watson@atrium-homes.co.uk please.

I look forward to receiving your completed application form.

Shannon Watson

Shannon Watson
Chief Executive

ATRIUM HOMES
The Landlord of Choice

Would you be interested in being a volunteer Board member

Would you like to be part of an organisation that is committed to delivering good quality, affordable homes with excellent customer service? We recognise that by putting our tenants and customers' voices at the heart of what we do, we can better support our goals of improving tenants' homes, lives and communities.

Atrium Homes, based in Kilmarnock, is a Registered Social Landlord and Scottish Charity providing social housing to over 1,200 households in nine towns across East Ayrshire. Factoring services are provided to Atrium Homes and over 1,400 owners by its subsidiary.

Collectively, the Board is responsible for exercising scrutiny, establishing organisational strategy and objectives and for monitoring operational performance, and we are currently looking to strengthen our overall governance through the appointment of a small number of Board Members.

We are looking for new Board members to help us achieve the right mix of skills and experience to match our business needs at an exciting time for Atrium. This year our Board will be setting Atrium's strategy for the period commencing 1 April 2026 and so you will have an opportunity to be involved in shaping the services we provide to our customers.

Skills and knowledge that we would love to see further represented on our Board just now include an experienced Finance Professional or a local business leader looking to make a difference to the lives of people living in our communities.

Equally, we are always very keen to attract people who have had experience of our services as customers and who are committed to helping us improve those services. What is most important to us is that Board members share our core values and objectives, possess an inquiring mind and demonstrate a willingness to challenge.

All positions are voluntary but reasonable expenses to facilitate attendance at meetings will be paid. Induction and further training will also be provided.

You can also find out more about our activities by vising our website https://www.atrium-homes.co.uk/ or the SHR website https://www.housingregulator.gov.scot/

An applicant information pack can be downloaded by clicking on the link to the pack on this page.

If you wish to apply to be a Board Member, please complete our application form which can be downloaded by clicking on this link: Application-Form and send it in to us.

Notes:
In the first instance, most successful applicants will join the Board as co-optees until formal election is confirmed by the Membership at the AGM in August. Board members are expected to attend ten meetings in the year plus four quarterly meetings for one chosen sub-committee, and annual planning and review meetings. Board meetings use a virtual arrangement for the majority of the meetings, and we ask Board to meet in person at small number of times a year at the organisation's offices in Kilmarnock.
This is an excellent opportunity for someone to help make a difference to people's lives. Please contact us at info@atrium-homes.co.uk or call 01563 528816 for an informal discussion with Shannon Watson, Chief Executive.

ATRIUM HOMES

The Landlord of Choice

Role Description for Governing Body Members

Atrium Homes
Role Description for Governing Body Members

Compliant with Scottish Housing Regulator's Regulatory Framework:	
Compliant with Tenant Participation Strategy:	N/A
Compliant with Equal Opportunities:	Yes
Compliant with Business Plan:	N/A
Date Approved:	November 2021
Date Reviewed:	October 2024
Date for Next Review:	October 2027 or earlier if required by changes in legislation or guidance, or if the Governing Body sees fit
Responsible Officer:	Chief Executive
The Role Description for Board Members has a direct link to the following Atrium policies and procedures:	Atrium's Rules and Membership Policy Codes of Conduct for Board Members Standing Orders of the Governing Body and Sub-Committees Role Descriptions for Chair and Vice Chair Remits for Finance, Audit & Staffing, Property Services and Housing & Community Services Sub-Committees Risk Management Policy

Atrium Homes
Role Description for Governing Body Members

1. Introduction

"The Governing Body leads and directs the RSL to achieve good outcomes for its tenants and other service users." Regulatory Standards of Governance and Financial Management, Standard 1[1]

1.1. This role description has been prepared to set out the responsibilities that are associated with being a Governing Body Member (GBM) of Atrium Homes (Atrium). It should be read in conjunction with Atrium's Articles of Association and Standing Orders.

1.2. Atrium Homes is a Registered Social Landlord and a Scottish Charity. The role description reflects the principles of good governance and takes account of (and is compliant with) the expectations of the Regulatory Standards of Governance and Financial Management for Scottish RSLs and relevant guidance produced by the Office of the Scottish Charity Regulator (OSCR).

1.3. Atrium encourages people who are interested in the Association's work to consider seeking election as a GBM and is committed to ensuring broad representation from the communities that it serves. GBMs do not require 'qualifications' but, from time to time, we will seek to recruit people with specific skills and experience to add to or expand the existing range of skills and experience available to ensure that the governing body is able to fulfil its purpose. We carry out an annual review of the skills that we have and those that we need to inform our recruitment activities.

1.4. This role description applies to all members of the governing body, whether elected, co-opted or appointed, new or experienced. It is subject to periodic review.

2. Primary Responsibilities

2.1. As a GBM your primary responsibilities are, along with the other members of the governing body, to

- Lead and direct Atrium's work
- Promote and uphold Atrium's values
- Set and monitor standards for service delivery and performance
- Control Atrium's affairs and ensure compliance
- Uphold Atrium's Code of Conduct and promote good governance

2.2. Responsibility for the operational implementation of Atrium's strategies and policies is delegated to the Chief Executive.

[1] Scottish Housing Regulator (February 2024) *Regulatory Framework*

3. Key Expectations

3.1. Atrium has agreed a Code of Conduct for GBMs which every member is required to sign on an annual basis uphold throughout their membership of the governing body. You may not take up a position on the governing body unless you have signed the Code of Conduct.

3.2. Each GBM must accept and share collective responsibility for the decisions properly taken by the governing body. Each GBM is expected to contribute actively and constructively to the work of Atrium. All members are equally responsible in law for the decisions made.

3.3. Each member must always act only in the best interests of Atrium and its customers, and not on behalf of any interest group, constituency or other organisation. GBMs cannot act in a personal capacity to benefit themselves or someone they know.

3.4. You are required to declare any interests you might have, particularly those which might conflict with the interests of Atrium.

4. Main Tasks

- To contribute to formulating and regularly reviewing Atrium's values, strategic aims, business objectives and performance standards
- To monitor Atrium's performance
- To be informed about and ensure Atrium's plans take account of the views of tenants and other customers
- To ensure that Atrium operates in accordance with and is compliant with relevant legal and regulatory requirements
- To ensure that risks are realistically assessed and appropriately monitored and managed
- To ensure that Atrium is adequately resourced to achieve its objectives and meet its obligations
- To oversee and ensure Atrium's financial viability and business sustainability whilst maintaining rents at levels that are affordable to tenants
- To act, along with the other members of the governing body, as the employer of Atrium's staff
- To ensure that Atrium is open and accountable to tenants, regulators, funders and partners

5. Duties

- Act at all times in the best interests of Atrium

- Accept collective responsibility for decisions, policies and strategies
- Attend and be well prepared for meetings of the governing body and sub-committees; if for any reason you cannot attend a meeting, submit your apologies timeously and in advance
- Contribute effectively to discussions and decision making
- Take part in training and other learning opportunities
- Take part in an annual review of the effectiveness of Atrium's governance and of your individual contribution to Atrium's governance
- Maintain and develop your personal knowledge of relevant issues and the wider housing sector
- Represent Atrium positively and effectively at all times, including when in our local communities and when attending meetings and other events
- Respect and maintain confidentiality of information
- Treat colleagues with respect and foster effective working relationships within the governing body and between the governing body and staff
- Be aware of and comply with our policy on the restrictions on payments and benefits
- Register any relevant interests as soon as they arise and comply with Atrium's policy on managing conflicts of interest

6. Commitment

6.1. An estimate of the regular annual time commitment that is expected from GBMs is shown below. Over and above this, you may be asked to become involved in a range of activities such as interviewing prospective staff or consultants; procurement processes; ad hoc working parties; and ambassadorial roles at formal dinners etc.

Activity	Time
Attendance at **10** regular meetings of the governing body (9 meetings are held virtually and 1 is held in person at our offices)	**20 hours**
Reading and preparation for meetings of the governing body	**20 hours**
Attendance at up to **4** sub-committee meetings	**10 hours**
Reading and preparation for sub-committee meetings	**10 hours**
Attendance at annual planning and review events (including individual review meeting)	**12 hours**
Attendance at internal briefing and training events	**8 hours**
External Training and conference attendance (may include overnight stay or weekend)	**16 hours**
Total	**96 hours**

6.2. Board meetings take place in the evenings of the last Tuesday of the month (excluding July and December) commencing at 6:00p.m. if virtual and 6:15 p.m. if in person. Because they are planned and scheduled in advance, there is an expectation that GBMs will prioritise attendance over other activities.

6.3. Irregular patterns of attendance by GBMs will be addressed by the Chair. Should a GBM miss four successive Board meetings the Articles of Association deem that they will have automatically disqualified themselves from Board membership unless the Board has approved a leave of absence in advance of this.

7. What Atrium Offers GBMs

7.1. All GBMs are volunteers and receive no payment for their contribution. Atrium has policies which prevent you or someone close to you from inappropriately benefiting personally from your involvement with Atrium. These policies also seek to ensure that you are not unfairly disadvantaged by your involvement with Atrium. All out of pocket expenses associated with your role as a GBM will be fully met and promptly reimbursed.

7.2. In return for your commitment, Atrium offers:

- A welcome and introduction when you first join the governing body;
- A mentor from the governing body and a named staff contact for the first six months, with ongoing support
- Clear guidance, information and advice on your responsibilities and on Atrium's work
- Formal induction training to assist settling in
- Access to Share's e-learning portal, training and briefing sessions
- Papers which are clearly written and presented, and circulated electronically in advance of meetings
- A tablet or comparable electronic device, should you need it to access the papers
- The opportunity to put your experience, skills and knowledge to constructive use
- The opportunity to develop your own knowledge, experience and personal skills
- The chance to network with others with shared commitment and ideals

8. Review

8.1. This role description will form the basis of the annual review of the effectiveness of your contribution to our governance.

ATRIUM GROUP

Code of Conduct for Governing Body Members

Date Approved	March 2023
Date for Review:	March 2028
	or earlier if SHR/ SFHA issue updated guidance
Responsible Officer:	Chief Executive

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The Atrium Group comprises ***Atrium Homes*** a Registered Social Landlord with charitable status, and ***Atrium Initiatives*** a wholly owned commercial subsidiary.

Introduction

1.1 All members of the Board must sign this Code of Conduct when they are elected, co-opted or appointed, and on an annual basis thereafter. References throughout this Code of Conduct (the Code) to 'we', 'us' and 'our' can refer to both or either Atrium Homes and Atrium Initiatives. The Code reflects our Values which are:

Service	provide a quality service to customers
Excellence	strive for excellence, innovation and improvement
Respect	respect diversity and others' input
Integrity	be open, honest, fair and inspire trust
Accountability	stand by decisions and take ownership of your actions
Commitment	be committed to your role and proud of what we do
Enjoyment	people enjoy their roles and making a difference

1.2 We attach the greatest importance to ensuring that high standards of governance and ethical behaviour are demonstrated by all of our people and in all of our activities.

1.3 Our Code of Conduct sets out the requirements and expectations which are attached to your role as a member of our Governing Body. You have a personal responsibility to uphold the requirements of our Code. You cannot be a member of the Governing Body[1] if you do not agree to adopt our Code of Conduct. To confirm that you understand its requirements and accept its terms, you must review and sign this Code annually.

1.4 Atrium Homes as a Registered Social Landlord (RSL), is required to adopt and comply with an appropriate Code of Conduct[2]. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations, which the Scottish Housing Regulator (SHR) has confirmed fully complies with its Regulatory Standards. We have determined that this Code of Conduct should also apply to Board members appointed by Atrium Homes to serve on its wholly owned subsidiary, Atrium Initiatives.

1.5 Our Code of Conduct is an important part of our governance arrangements and is supported by the Role description which describes your responsibilities as a Governing Body member. You are responsible for ensuring that you are familiar with the terms of this Code and that you always act in accordance with its requirements and expectations. Governing Body Members must always ensure their actions accord with the legal duties of the RSL and with regulatory guidance. You must also ensure you are familiar with any policies which are linked to this code.

[1] Our Rules state that the Governing Body can remove a member who fails to sign the Code of Conduct (Rule 34.2.2); it is a regulatory requirement that our Rules enable the Governing Body to take such action (SHR Regulatory Framework (2019) Constitutional Standard 19

[2] Scottish Housing Regulator (2019) Regulatory Framework, Regulatory Standard 5.2

1.6 If there is a concern that a member of the Governing Body appears to have breached any part of this Code, the matter will be investigated in accordance with the procedures set out at Appendix 2. A serious breach of our Code may result in action being taken by the Governing Body to remove the Governing Body member(s) involved.

1.7 This code of conduct was adopted by our Governing Body on [28 March 2023].

Who our Code applies to

2.1 Our Code of Conduct applies to all elected, appointed and co-opted members of our Governing Body and its sub-committees and to the governing bodies of all subsidiaries and members of the Atrium Group.

How our Code is structured

3.1 Our Code of Conduct is based on the seven principles which are recognised as providing a framework for good governance. They demonstrate honesty, integrity and probity.[3]

3.2 Each principle is described, as it applies to the activities of the Atrium Group and its Governing Body Members, and supporting guidance is offered for each to provide more explanation of our Code's requirements. The guidance is not exhaustive and it should be remembered that the Atrium Group and our Governing Body Members are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding.

3.3 The seven principles that you must adhere and commit to by signing this Code are:

A. Selflessness (page 4)

B. Openness (page 5)

C. Honesty (page 6)

D. Objectivity (page 7)

E. Integrity (page 8)

F. Accountability (page 9)

G. Leadership (page 10)

[3] Committee for Standards in Public Life (May 1995), Nolan Principles

A. Selflessness

You must act in the best interests of the Atrium Group at all times and must take decisions that support and promote our strategic plan, aims and objectives. Members of the Governing Body should not promote the interests of a particular group or body of opinion to the exclusion of others.

A.1 I will always uphold and promote the Atrium Group's aims, objectives and values and act to ensure their successful achievement.

A.2 I will exercise the authority that comes with my role as a Governing Body member responsibly.

A.3 I will accept responsibility for all decisions properly reached by the Governing Body (or a sub-committee or working group with appropriately delegated responsibility) and support them at all times, even if I did not agree with the decision when it was made.

A.4 I will consider and respect the views of others.

A.5 I will not seek to use my position inappropriately to influence decisions that are the responsibility of staff.

A.6 I will not seek to use my influence in appropriately or for personal gain or advantage or for the benefit of someone to whom I am closely connected[4] or their business interests.

[4] See Appendix 1, p13-15 for definition of "closely connected"

B. Openness

You must be transparent in all of your actions; you must declare and record all relevant personal and business interests and must be able to explain your actions.

B.1 I will use my best endeavours and exercise reasonable skill and care in the conduct of my duties.

B.2 I will avoid any situation that could give rise to suspicion or suggest improper conduct.

B.3 I will declare any personal interest(s) and manage openly and appropriately any conflicts of interest; I will observe the requirements of our policy on the matter. I will keep my entry in the Register of Interests complete, accurate and up to date. I will make an annual statement to confirm my declarations.

B.4 I will not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety, influence or place me under an obligation to these individuals or organisations. I will comply with the Atrium Group's policy on the matter.

B.5 I will ensure that, in carrying out my role as a Governing Body member, I am informed about and take account of the views, needs and demands of tenants and service users.

B.6 I will ensure that the Atrium Group is open about the way in which it conducts its affairs and positive about how it responds to requests for information.

B.7 I will not prevent people or bodies from being provided with information that they are entitled to receive.

C. Honesty

You must ensure that you always act in the best interests of the organisation and that all activities are transparent and accountable.

C.1 I will always act honestly and in good faith when undertaking my responsibilities as a Governing Body member.

C.2 I will use my experience, skills, knowledge and judgement effectively to support our activities.

C.3 I will ensure that decisions are always taken and recorded in accordance with our Rules and procedures.

C.4 I will ensure that the Atrium Group has an effective whistleblowing policy and procedures to enable, encourage and support any staff or Governing Body member to report any concerns they have about possible fraud, corruption or other wrongdoing.[5]

C.5 I will report any concerns or suspicions about possible fraud, corruption or other wrongdoing to the appropriate senior person within the organisation in accordance with our whistleblowing policy.

C.6 I will comply with our policies and procedures regarding the use of our funds and resources and I will not misuse, contribute to or condone the misuse of these resources.[6]

C.7 We forbid all forms of bribery, meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. I will neither accept nor give bribes or any other inducement to anyone. I will comply with our policy on bribery and report any instances of suspected bribery or corruption within the organisation or any of its business partners.

C.8 I will ensure that neither I nor someone closely connected to me receives or is seen to receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers. I will declare all interests openly and ensure they are effectively managed to demonstrate this.

[5] These concerns might include, but are not confined to, suspected fraud, dishonesty, breach of the law, poor practice, non-compliance with regulatory requirements, misconduct, breach of this code.

[6] Resources include people, equipment, buildings, ICT, funds, knowledge, stationery, transport

D. Objectivity:
You must consider all matters on their merits; you must base your decisions on the information and advice available and reach your decision independently.

D.1 I will ensure that the decisions that I take are consistent with our aims and objectives and with the relevant legal and regulatory requirements (including those of the Scottish Housing Regulator, and the Office of the Scottish Charity Regulator).

D.2 I will prepare effectively for meetings and ensure I have access to all necessary information to enable me to make well-informed decisions.

D.3 I will monitor performance carefully to ensure that the organisation's purpose and objectives are achieved, and take timely and effective action to identify and address any weaknesses or failures.

D.4 I will use my skills, knowledge and experience to review information critically and always take decisions in the best interests of the organisation, our tenants and our service users.

D.5 I will ensure that the Governing Body seeks and takes account of additional information and external / independent advice and / or specialist advice where necessary and / or appropriate.

D.6 I will ensure that effective policies and procedures are implemented so that all decisions are based on an adequate assessment of risk, deliver value for money, and ensure the financial well-being of the organisation.

D.7 I will contribute to the identification of training needs, keep my knowledge up to date, and participate in training that is organised or supported by the Atrium Group.

E. Integrity:

You must actively support and promote our values; you must not be influenced by personal interest in exercising your role and responsibilities.

E.1 I will always treat my Governing Body colleagues, our staff, our customers and partners with respect and courtesy.

E.2 I will always conduct myself in a courteous and professional manner; I will not, by my actions or behaviour, cause distress, alarm or offence.

E.3 I will publicly support and promote our decisions, actions and activities; I will not, by my actions or behaviour, compromise or contradict the organisation, its activities, values, aims or objectives. I will notify the Chair quickly if I become aware of any situation or event that I am associated with which could affect the Atrium Group and/or its reputation.

E.4 I will fulfil my responsibilities as they are set out in the relevant role description(s); I will maintain relationships that are professional, constructive and that do not conflict with my role as a Governing Body member.

E.5 I will comply with, support and promote our policies relating to equalities, diversity and human rights as well as uphold our whistleblowing and acceptable use[7] policies.

E.6 I will respect confidentiality and ensure that I do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of the Governing Body and after I have left.

E.7 I will observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information.

[7] This relates to the use of ICT, social media and networking, facilities etc., and is specific to each individual RSL.

F. Accountability

You must take responsibility for and be able to explain your actions, and demonstrate that your contribution to our governance is effective.

F.1 I will observe and uphold the principles and requirements of the SHR's Regulatory Framework and gain assurance that relevant statutory and regulatory guidance and the Atrium Group's legal obligations are fulfilled.

F.2 I will ensure that we have effective systems in place to monitor and report our performance and that corrective action is taken as soon as the need is identified.

F.3 I will contribute positively to our activities by regularly attending and participating constructively in meetings of the Governing Body, its committees and working groups.

F.4 I will participate in and contribute to an annual review of the contribution I have made to our governance.

F.5 I will ensure that there is an appropriate system in place for the support and appraisal of our Senior Officer and that it is implemented effectively.

F.6 I will not speak or comment in public on our behalf without specific authority to do so.

F.7 I will co-operate with any investigations or inquiries instructed in connection with this Code whilst I am a Governing Body member and after I have left.

F.8 I recognise that the Governing Body as a whole is accountable to its tenants and service users, and I will demonstrate this in exercising my judgement and in my decision-making.

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G. Leadership:

You must uphold our principles and commitment to delivering good outcomes for tenants and other service users, and lead the organisation by example.

G.1 I will ensure that our strategic aims, objectives and activities deliver good outcomes for tenants and service users. I will make an effective contribution to our strategic leadership.

G.2 I will ensure that our aims and objectives reflect and are informed by the views of tenants and service users.

G.3 I will always be a positive ambassador for the organisation.

G.4 I will participate in and contribute to the annual review of the Governing Body's effectiveness and help to identify and attain the range of skills that we need to meet our strategic objectives.

G.5 I will not criticise or undermine the organisation or our actions in public.

G.6 I will not criticise staff in public; I will discuss any staffing related concerns privately with the Chair and / or Senior Officer.

G.7 I will not harass, bully or attempt to intimidate anyone.

G.8 I will not use social media to criticise or make inappropriate comments about the organisation, its actions or any member of the Governing Body, staff or other partners.

G.9 I will not act in a way that could jeopardise our reputation or bring us into disrepute.[8]

[8] This includes activities on social media, blogs and networking sites.

Breach of this Code

I recognise that each member of the Governing Body has a personal and individual responsibility to promote and uphold the requirements of this Code. If I believe that I may have breached the Code, or I have witnessed or become aware of a potential breach by another member, I will immediately bring the matter to the attention of the Chair.

Acceptance and Signature

I _____ have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as a member of our Governing Body. I am aware that I must declare and manage any personal interests. I agree to review all relevant Registers regularly to ensure that all entries relating to me are accurate. I understand that, if I am found to have breached this Code of Conduct, action will be taken by the Governing Body which could result in my removal.

Signed _____

Date _____

Appendix 1

Declaring and Managing Personal Interests

1. Introduction

1.1 Being a member of our Governing Body is of course only one part of your life. Other aspects of your life - such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements - may have the potential to cross over into your role as a Governing Body Member.

1.2 However, as we are an organisation that works for the community [and uses public funds], it is essential that there is no conflict - and that there can be no reasonable perception of conflict - between your duties as a Governing Body Member and your personal (or personal business or financial) interests.

1.3 Any potential conflict between your position as a member of Governing Body and your other interests must be openly declared and effectively managed so as to protect the good reputation of Atrium and the RSL sector.

1.4 Where you have a personal business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered) or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in the Register of Interests.

1.5 This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

2. Examples of interests that must be declared

2.1 The following are examples of the kind of interest that you must declare. Please note that this list is not exhaustive, and there may be other interests that you should also declare.

- Tenancy of a property (by you or someone to whom you are closely connected) of which we are the landlord.
- Occupancy or ownership of a property (by you or someone to whom you are closely connected) which is factored or receives property related services from us.
- Receipt of care or support services from us.
- Membership of a community or other voluntary organisation that is active in the area(s) we serve.
- Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.
- Membership of the governing body of another RSL.

- Being an elected member of any local authority where we are active.
- If you purchase goods or services from us.
- If you purchase goods or services from one of our contractors or suppliers.
- If you are involved in the provision of goods or services or employed by an organisation that is involved in the provision of goods or services to us
- Significant shareholding in a company that we do business with.
- Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.
- Ownership of land or property in our areas of operation excluding for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.

2.2 If you are not sure whether a certain matter needs to be declared, you must seek guidance from the Chair or CEO. If doubt remains, the advice would always to declare the matter.

2.3 You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.

3. Definition of 'close connection'

3.1 Someone ‘closely connected‘ to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or law.

3.2 As well as considering your own actions, you must be aware of the potential risk created by the actions of people to whom you are closely connected. Who you should consider, and our expectations of you to identify and declare such actions are outlined in Table A on page 14.

Table A

Group	Required Response
1. Members of your household This includes: • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home	We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.
2. Partner, Relatives and friends This includes: • Your partner (if not part of household) • Your relatives and their partners • Your partner's close relatives (i.e. parent, child, brother or sister) • Your close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as neighbours, someone you know socially or business contacts/associates)	Where you have a close connection and are in regular contact with anyone within this group, we expect you to be aware of and declare any relevant actions. Under these circumstances, you must take steps to identify, declare and manage these actions. Where you do not have a close connection and regular contact with someone in this group, we do not expect you to be aware of or to go to unreasonable lengths to identify any relevant actions. However, if you happen to become aware of relevant actions by such individuals, then these should be declared and managed as soon as possible.

What You Need to Consider

3.3 The following are the relevant actions /involvement by those to whom you are closely connected that you should consider, declare and manage as per our expectations outlined in Table A:

- A significant interest in a company or supplier that we do business with. A significant interest means ownership (whole or part) or a substantial shareholding in a business that distributes profits, but does not include where an individual has shares in large companies such as banks, utility companies or national corporations, i.e. where owning shares would not give the individual any significant influence over the activities of that organisation.

- Where the individual may benefit financially from a company with which we do business
- Involvement in the management of any company or supplier with which we do business
- Involvement in tendering for or the management of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join our Board or any of its subsidiaries
- Application to be a tenant or service user of the organisation
- If they are an existing tenant or service user of the organisation

4. Practical Arrangements for Declaring personal interests

4.1 As a Governing Body Member you are required, on appointment, to complete a form to register any personal interests that could potentially conflict with your role and thereafter to complete a new form (or amend the existing form) whenever there is a material change. You will also be prompted annually to update the register.

4.2 You must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.

4.3 A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of our Governing Body – both internal and external.

4.5 Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.

Appendix 2:
Protocol for Dealing with an Alleged / Suspected Breach of the Code of Conduct

1. Introduction

1.1 This protocol will be used by the Atrium Group to deal with any alleged breaches of our Code of Conduct for Governing Body Members. It is based on the Model Protocol provided by SFHA.

2. Who is Responsible?

2.1 The Chair has delegated authority to deal with all potential breaches of the Code, unless the allegation relates to him/her. In that event, the Vice Chair should take on the responsibilities that the protocol allocates to the Chair. It may be necessary to ask other members of the Governing Body to take on responsibilities should the allegation relate to both the Chair and Vice Chair.

2.2 The Chair should consult with other office-bearers (or members of the Governing Body) to instruct, progress and conclude internal and external investigations carried out in accordance with this protocol.

2.3 The table below identifies who has primary responsibility for overseeing the management of alleged breaches of the Code of Conduct

Delegated Authority to Oversee Potential Breaches	Any two from the following (must include at least one Governing Body member
Governing Body	Chair, Vice-Chair
Senior Staff	Chief Executive, Director of Operations, Director of Investment

2.4 No one who is directly involved in a matter that gives rise to a concern that there may have been a breach of the Code of Conduct should be involved in reviewing or managing/conducting an investigation of the matter. Consequently, it may be necessary to ask other members of the Governing Body to take on the responsibilities that the Protocol allocates to the Chair and other office bearers.

2.5 The Chair may seek advice from our solicitors in exercising all of the responsibilities associated with this protocol.

3. What Constitutes a Breach?

3.1 A breach of the Code of Conduct is a serious matter. This Protocol is a process that will apply to managing and/or responding to alleged breaches of the Code of Conduct. Breaches can include:

- Conduct by a Governing Body member during a meeting (which might involve a member being obstructive, offensive or disregarding the authority of the Chair or failing to observe Standing Orders)
- Complaints that the conduct of a Governing Body member has failed to meet the requirements of the Code of Conduct; is contrary to the Atrium Group's Values, Rules or policies; threatens the reputation of the Atrium Group; risks bringing the organisation into disrepute or undermines the Atrium Group and/or its people
- Inappropriate behaviour towards colleagues, staff, customers or partners

3.2 Some complaints and/or concerns may relate to relatively minor matters, whilst other may involve more significant issues. Consequently, different approaches are likely to be appropriate, depending on the details of individual circumstances, recognising that it may not always be appropriate to undertake a formal investigation in response to an isolated and/or relatively minor issue.

4. Initial Review to Determine if Further Investigation Required

4.1 When a complaint is received or a concern is raised, consideration should be given as to which is the most appropriate course of action. This may (but may not) require some initial review of the complaint or allegations before concluding on a specific approach. The review should be carried out by those members of the Governing Body appointed in accordance with 2.2 of this Protocol, with support from the Chief Executive if required.

4.2 It may be that such a review concludes that there is no substance to the concern or allegation. Depending on the circumstances, it may be appropriate to report the outcome of such a review to the Governing Body. This might be the case, for example, if an anonymous complaint is received which cannot be investigated because of a lack of information.

4.3 Anonymous complaints or allegations can be difficult to resolve but, in the event that anonymous information is received or made known, an initial review should be undertaken to establish whether there is the potential for any substance to the concern. If so, an investigation should be undertaken, although it is recognised that it may not be possible to conclude any such investigation satisfactorily.

4.4 Minor issues, actions or conduct at an internal meeting or event are unlikely to constitute a breach of the Code of Conduct that warrant investigation. The Chair (and other office bearers) should exercise their judgement in determining which of the courses of action set out in this Protocol is more appropriate.

4.5 Two routes are described in this Protocol: Route A and Route B.

4.6 SHR requires that alleged breaches of the Code which are to be investigated under either Route A or Route B must be regarded as Notifiable Events, in accordance with the terms of the SHR's Statutory Guidance. The Chair is responsible for ensuring that the necessary notifications are made to the Scottish Housing Regulator, and that

the SHR's requirements (as set out in the relevant guidance[9]) in terms of reporting the outcome of the investigation are met.

5. Route A

5.1 Route A is an **i**nternal and informal process to address potential minor breaches. This is intended to be a relatively informal process, used to address e.g. one-off discourtesy at an internal meeting, isolated or uncharacteristic failure to follow policy.

5.2 Alleged breaches that occur during the course of a meeting or other internal event (and which have not happened before) will, unless the Chair believes it to be serious, be dealt with by the Chair of the meeting, either during the meeting/event and/or within 24 hours of the meeting. In these circumstances, the Chair may ask the member to leave the meeting or a vote may be taken to exclude the member from the rest of the meeting.

5.3 After the meeting, the Chair or sub-committee Convenor will discuss such behaviour with the member and may require the member to apologise or take such other action as may be appropriate (Route A). Where the Chair regards such behaviour as being serious, it should be investigated in accordance with Route B as will repeated incidents of a similar nature.

5.4 It may be appropriate for the Chair to record the terms of the discussion in a letter to the Governing Body member e.g. to confirm the provision of training or support or to record a commitment to uphold a specific policy or to record an apology.

5.5 It is possible that a concern that it is initially agreed can be addressed via route A ends up being the subject of a formal investigation, if more significant issues emerge, or actions are repeated.

6. Route B

6.1 Route B will involve formal investigation of repeated breaches or an alleged significant/major breach. Investigations may be conducted internally or independently, according to the circumstances and people involved.

6.2 An investigation under Route B will usually be overseen by the Chair and another office-bearer or Governing Body member.

6.3 The Chair or office-bearer, in consultation with the other office-bearers will decide whether to instruct an independent investigation or carry out an internal investigation.

6.4 In the event that the Chair or other office-bearer is the subject of a complaint, an independent investigation should be conducted, overseen by the Vice-Chair and another Governing Body member.

6.5 If the Chair is likely to be involved in an investigation (e.g. as a witness), it will be necessary for the office bearers to consider who should be involved in overseeing the

[9] Scottish Housing Regulator (2019) Notifiable Events guidance

investigation.

6.6 The Chief Executive can support the implementation of the Protocol (unless involved in the issue, in which case the role should be assigned to another senior member of staff).

6.7 Our scheme of delegation identifies who has primary responsibility for overseeing the management of alleged breaches of the Code of Conduct (see section 2.3).

6.8 Allegations of a potential breach should normally be made to the Chair or, where the complaint relates to the Chair, to another office-bearer. Where a complaint is made to the Chief Executive the matter should immediately be notified to the Chair.

6.9 Alleged breaches may be the subject of written complaints or allegations; they may also be witnessed by someone. However the alleged breach is identified, the Chair and Secretary should ensure that there is always a written statement of the complaint or allegation that is used as the basis for the investigation. If no written complaint is made, the statement of the matter should be prepared by someone unconnected to the event/situation (e.g. a verbal complaint made by a Governing Body member should be recorded by someone who was not present when the issue arose – this could be a member of staff).

6.10 The Governing Body member who is the subject of the complaint/allegation that is to be investigated will be notified in writing of the alleged breach within seven working days, either of occurring or of receipt of the complaint. A Governing Body member who is subject to an investigation should take leave of absence until the matter is resolved. The letter will inform the Governing Body member of the nature of the potential breach, the arrangements for the investigation and will advise that leave of absence will be in place for the duration of the investigation. Governing Body members are expected to co-operate with such investigations[10].

6.11 An alleged breach of the Code of Conduct which is being dealt with via Route B will be notified to the Governing Body, normally by the Chair or Secretary, within seven working days, either of occurring or of receipt of the complaint. The notice (which should be confidential) will not describe the detail of the complaint and will set out the proposed arrangements for investigation, including who will conduct the investigation and which members of the Governing Body are responsible for its oversight.

6.12 The appointment of an external Investigator (when it is decided to be the appropriate response) should be approved by the Governing Body members responsible for overseeing the investigation.

6.13 An internal investigation (when it is decided to be the appropriate response) will be carried out by at least two and not more than three Members of the Governing Body, who are not responsible for overseeing the investigation. In selecting the Governing Body members, we will seek to ensure that the investigators represent the profile of the Governing Body.

[10] Code of Conduct F7

7. Investigation Under Route B

7.1 The conduct of an investigation should remain confidential, as far as possible, in order to protect those involved (witnesses, complainant(s)) and the Governing Body member(s) who are the subject of the complaint.

7.2 All investigations will be objective and impartial. Investigations will normally be investigated by an independent person, unless it is decided that an internal investigation is appropriate.

7.3 Investigations should not usually take more than six weeks to conclude.

7.4 The investigator(s) will be supported by the Chief Executive (or other senior member of staff if the Chief Executive is involved in the complaint). The Chair and other office-bearer, with any support they feel necessary, will brief the agreed advisor/investigator and then consider their recommendations at the end of the investigation, before reporting to the Governing Body.

7.5 All investigations will be the subject of a written brief which sets out the Governing Body's requirements and which includes the statement of the alleged breach (scope, timescale, reporting requirements, access to information etc.). The brief may refer to any action previously taken that is relevant.

7.6 All investigations will include at least one interview with the Governing Body member who is the subject of the allegation, who will be invited to provide any relevant information. The interview(s) may be conducted face to face or remotely (by telephone or video call). Governing Body members may be accompanied during an interview by a friend (at their request), as a companion to provide support and not to represent. It is not appropriate for another Governing Body member to fulfil this role nor is it appropriate for the RSL to meet any costs (other than reasonable expenses as provided for in the relevant policy) in respect of a companion's attendance.

8. Considering the Outcome of the Investigation

8.1 The advisor/investigator will normally present their report to the Governing Body. Before doing so, the report will be reviewed by those overseeing the investigation to ensure that the Brief has been met and that the report is adequate to support the Governing Body's consideration and decision making.

8.2 The Governing Body member whose conduct is being investigated will not be party to any of the discussions relating to the investigation.

8.3 The report will be considered at a meeting of the Governing Body, which may be called specifically for this purpose. It is the responsibility of the Governing Body to consider the report and findings from the investigation and to determine:

- Whether there has been a breach
- How serious a breach is
- What action should be taken

8.4 The Governing Body will report the findings of the investigation and the proposed action to the member concerned within seven days of the meeting at which the report of the investigation was considered.

9. Action to Deal with a Breach

9.1 If, following investigation, a breach of the Code is confirmed, action will be taken in response. This action will reflect the seriousness of the circumstances. It may take the form of some or all of the following:

- A discussion with the member concerned (which may be confirmed in a subsequent letter)
- advice and assistance on how their conduct can be improved
- the offer of training or other form of support
- a formal censure (e.g.in the form of a letter setting out the conclusions, expressing concern and specifying that there must be improvement / no repetition etc)
- a vote to remove the Member from the Governing Body

9.2 Where, it is concluded that a serious breach has occurred, the Governing Body may require the member to stand down from their position in accordance with the Rules.

9.3 If the Governing Body proposes to remove a member, following investigation, the member will have the right to address the full Governing Body before their decision is taken at a special meeting called for that purpose. Any such decision must be approved by two thirds of the remaining members of the Governing Body, in accordance with Rule 34.2.

9.4 A record of the outcome of an investigation will be retained in the Governing Body member's file for 12 months.

9.5 The outcome of any investigation will be notified to the Scottish Housing Regulator, in accordance with the requirements of the Notifiable Events Statutory Guidance.

10. Definitions

10.1 the Atrium Group will regard the following actions as a "serious breach" of the Code of Conduct (this list is not exhaustive):

- Failure to act in our best interests and/or acting in a way that undermines or conflicts with the purposes for which we operate.
- Support for, or participation in, any initiative, activity or campaign which directly or indirectly undermines or prejudices our interests or those of our service users, or our contractual obligations.
- Accepting a bribe or inducement from a third party designed to influence the decisions we make.
- Consistent or serious failure to observe the terms of the Code of Conduct.

- Serious inappropriate behaviour towards a colleague, member of staff, tenant, customer, partner or stakeholder

11. Approval and Review

11.1 This protocol was approved by the Governing Body of Atrium Homes on 28 March 2023

ATRIUM HOMES

Privacy Notice – Board Members

(How we use your personal data)

This notice explains what personal data we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will process your personal data.

Board Privacy Notice

This notice explains what data we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your personal data.

1. Who are we?

Atrium Homes ("we" or "us") is committed to a policy of protecting the rights of individuals with respect to the processing of their personal data and adhere to data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5916972.

2. What data do we collect?

We collect the following data from you, both from data you have supplied through membership of the Association forms or any other instance where you have provided us with your personal data. We do not receive any additional information from third parties. We might collect the following:

(a) Name
(b) Date of Birth
(c) Address
(d) Telephone Number
(e) E-mail address
(f) NI number
(g) Protected characteristics under the Equality Act 2010, including age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
(h) Qualifications
(i) Details concerning health or any disability
(j) Occupation
(k) Bank account details (where applicable)
(l) Register of interest
(m) Signature
(n) Standard disclosure checks
(o) CCTV imagery
(p) Photos
(q) Relationship with current Board members and / or staff
(r) Positions with public responsibilities

(s) Legal & financial declarations
(t) Memberships and directorship held, together with duration
(u) Training records
(v) Video and audio for communications

We collect and use the above information and personal data for:

(a) Administration duties
(b) Payment of any out-of-pocket expenses
(c) Recruitment and selection
(d) Appraisal, training and development
(e) Membership of professional bodies
(f) Health, safety and wellbeing
(g) Equality monitoring
(h) Regulatory reporting

We may also process special categories of personal data required about you. Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

3. Who might personal data be shared with?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
- to complete a regulatory return in relation to the Board
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint or otherwise;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations.

4. What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- legitimate interests (including CCTV,d maintaining our disaster recovery plan, void property management, data sharing with utility companies, references and recognised legitimate interests in accordance with the Data (Use and Access) Act 2025)
- vital interests

- public task in the public interest / official authority
- legal obligation

5. Where do we keep your personal data?

Your information will only be processed within the UK and / or the European Economic Area ('EEA') other than where authorised by law.

6. How do we keep your personal data safe?

When you give us information, we take steps to make sure that your personal data is kept secure and safe. All data is held in accordance with Atrium Homes' data protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are held securely.

7. How long do we keep your personal data?

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law, and as detailed in our Retention Policy and Schedule.

8. What are your rights?

You have the right at any time to request us to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification
- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

9. Queries and Complaints

If you would like to find out more about how we use your personal data, wish to exercise any of your rights or have any queries or concerns about our use of your personal data, you can raise these with us by either contacting:

- Atrium Homes: DPO@atrium-homes.co.uk
- DPO (RGDP LLP): info@rgdp.co.uk

You also have the right to complain to the Information Commissioner's Office in relation to our use of your personal data. The Information Commissioner's contact details are noted below:

Telephone: 0303 123 1113
Online: Make a complaint | ICO

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

Acknowledgement of receiving and reading this notice

I _____ [print name] confirm that I have read and understood the contents of this Board Member Privacy Notice.

Signed **Date**

ATRIUM HOMES

DECLARATION OF INTERESTS FORM

NAME	***Please print your name below in block letters***
	Please state below whether you are a Board Member or Staff Member of Atrium
ADDRESS	***Board Members:*** ***please enter home address below***
	Staff Members: ***please enter the address where you work, below.*** *Continue on a separate sheet if necessary*
OCCUPATION	***Board Members:*** ***please enter your occupation and the name of your employer below***
	Staff Members: ***please state your job title –***
BUSINESS AND VOLUNTARY INTERESTS	***Board and Staff Members:*** ***before completing this section, please read Note [1] below*** *Continue on a separate sheet if necessary*
POSITIONS OF PUBLIC RESPONSIBILITY	***Board and Staff Members:*** ***before completing this section, please read Notes [1] and [2] below*** *Continue on separate sheet if necessary*

LIST OF SUPPLIERS

Please complete this section if you have any shares, financial interest, or employment interest, in any of the organisations shown in the "List of Suppliers." You should specify <u>all</u> of the organisations in which you have any such interest(s), and also include information on any close relative (Note 2) who is employed by any of these organisations. You should include <u>all</u> of the close relatives and <u>all</u> of the organisations that apply.

Continue on separate sheet if necessary

CLOSE RELATIVES: BOARD MEMBERS AND/OR ATRIUM STAFF MEMBERS

Please complete this section if you are a close relative (Note 2) of any Board Member and/or Atrium Staff Member (including Relief staff). You should provide the type of relationship(s) – partner, daughter etc – and the name of the Board Member or Staff Member – if a Staff Member, you should also include the name of the project where they are employed and their occupation (support worker etc). If more than one relationship, you should include all that apply. (If you are a Relief Staff Member and a close relative (Note 2) of a Board Member or other Atrium Staff Member, you should also include all details as specified above.)

continue on separate sheet if necessary

FURTHER INFORMATION

You should include any further information not already covered by the previous sections, if you consider that it may be relevant in respect of declarations of interest.

DECLARATION

I hereby confirm that, I _____ *(print name)* have no interests in any of the organisations included in the **List of Suppliers,** and used by Atrium or its subsidiary organisations, other than those declared above. I also confirm that I have declared all close relationships with any employees of the Supplier organisations, or with Atrium Board and Staff Members.

Signed: _____ Date: _____

NOTES

[1] Please give details of any other business or voluntary organisation of which you are a member (specifying the capacity in which you serve), as there may be overlap with the work of Atrium. Such organisations may include other s, voluntary groups, welfare groups etc.

[2] This section refers to central or local government, parliamentary activities or other public bodies. Please give details for yourself and close relatives (see Note 3 below).

[3] A close relative is defined as:

- A spouse, or civil partner or co-habitee of either gender
- Anyone related by marriage, i.e. an 'in law' relative
- A parent, step-parent, grandparent, child, stepchild, grandchild, brother, sister, uncle, aunt, nephew, niece
- A 'half-blood' relative
- Anyone who has been 'brought up as if' they are the person's child.